IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

>>>>>>>>>>>

DORA L. ADKINS, P.O. BOX 3825 MERRIFIELD, VA 22116 Plaintiff (pro se),



V. <u>CIVIL ACTION NO.:</u> 1= 20 eV 1410 N, AJT/MSN

HYATT CORPORATION, Registered Agent/Registered Office 100 Shockoe Slip Fl 2 Richmond, VA, 23219 - 4100, USA Defendant.

COMPLAINT

COMES NOW the Plaintiff, Dora L. Adkins, *pro se*, provides a "Complaint," against the Defendant, Hyatt Corporation. This Complaint includes: Count #1: Breach of Contract; Count #2: Intentional Infliction of Emotional Distress; and a Claim for Punitive Damages as a *Prima Facie* Case Cause of Action, states as follows for: Primary Claim of Chemical Poisoning:

DIVERSITY JURISDICTION

This Court enjoys subject matter jurisdiction over this action under 28 U.S.C. §1332(a)(1) because the Plaintiff, Dora L. Adkins resides in the State of Virginia; specifically, Fairfax County and Defendant's Principal Office is located in Chicago, IL which makes the two parties' citizens of different states and the

amount *in controversy* exceeds \$75,000. Specifically, Dora L. Adkins resides in Fairfax County with a mailing address of P.O. Box 3825, Merrifield, VA 22116 and the Defendant, Starbucks Corporation's Principal Office is located at 150 N Riverside Plz, Chicago, IL, 60606 - 1598, USA. (EXHIBIT #1: See, Copy of Business Entity Details for Hyatt Corporation, Proof of Diversity). The Diversity of citizenship between the Plaintiff, Dora L. Adkins and the Defendant, Hyatt Corporation is completely different; as well as the amount *in controversy* is for \$350,000 Dollars and this Honorable Court holds jurisdiction over the Complaint.

Plaintiff is asking for in Count #1: Breach of Contract – Two-Hundred Million Dollars; Count #2: Intentional Infliction of Emotional Distress – Two Hundred Million Dollars; and a Claim for Punitive Damages – Two-Hundred Million Dollars. The *in-controversy* amount for Punitive Damages is \$350,000. As a matter of law, Plaintiff established she has suffered an extreme & debilitating injury of emotional distress damages that satisfy the \$75,000 amount *in controversy* limit. Virginia cap on punitive damages. ... Virginia statute § 8.01-38.1 places a cap of \$350,000 on punitive damages courts may award to punish wrongdoers. Plaintiff will use the Virginia cap on punitive damages to meet the \$75,000 requirement for the amount *in controversy* limit.

INTRODUCTION TO PRIMA FACIE CASE:

1. The Plaintiff entered into a Contract with Defendant, Hyatt Corporation,

owner and operator of the Hyatt Regency Reston Hotel located in Reston Virginia which started on August 18, 2020. The Plaintiff reserved and paid for a Guest's Room by using a Debit Card at the Front Desk of the Hyatt Regency Reston Hotel located in Reston, VA. (EXHIBIT #2: See, Copy of Reservations made from August 18, 2020 through Present, at the Hyatt Regency Reston Hotel):

PRIMA FACIE CASE:

FACTS OF THE COMPLAINT:

- 2. During a consecutive stay starting on August 18, 2020 through Present, the Plaintiff suffered a physical injury of severe and debilitating Head and/or Brain injury from chemical poisoning that was spayed inside Guest Room #1505 on November 10, 2020.
- 3. The physical injury of a Brain Injury was allegedly caused by employees for Hyatt Regency Reston Hotel located in Reston, VA. (EMAIL #1: See, Email Sent to Self-Regarding the Chemical Spayed Inside Guest Room #1505, Dated, November 11, 2020).

EMAIL TO SELF REGARDING CHEMICAL POISONING SPRAYED INISIDE GUEST ROOM #1505

From: doraadkins7@aol.com

To: DoraAdkins7@aol.com < DoraAdkins7@aol.com>

Cc: DoraAdkins7@aol.com < DoraAdkins7@aol.com>

Date: Wed, Nov 11, 2020 8:17 am

EMAIL TO SELF REGARDING CHEMICAL POISONING SPRAYED INISIDE GUEST ROOM #1505

November 11, 2020

On November 10, 2020, after I returned from about 2-Hours of being out of Guest Room #1505 A CHEMICAL POISOING WAS SPRAYED INSIDE GUEST ROOM #1505.I became IMMEDIATELY GOT SICK with migraine headache, nausea and overall sickness. Something being sprayed inside Guest Room #1505 started on **Thursday**, **November 5, 2020** and I reported the incident to Rodney Brinson, Engineer for Hyatt Regency Hotel, located in Reston VA on Friday, November 6, 2020 when there was a made-up reason to enter Guest Room #1505 per a Notice received from Tyson Warren, General Manager on November 5, 2020.

Guest Room #1505 filled the air with the spayed substance.

WHEN WILL IT STOP! WHEN WILL IT STTOP!

If I leave the Hyatt Regency Hotel, located in Reston VA, WHERE WILL I GO IN THIS COVID-A9 PANDEMIC!! WITH NO FUNDS TO DO ANYTHING INCLUDING EATING!!!

Guests have been switched in and out of the Guest Room directly beside Guest Room #1505 to prevent detection of where the CHEMICAL POISONING IS COMING FROM. The Housekeeper is called to clean the Guest Room to prevent detection of where the CHEMICAL POISONING IS COMING FROM.

Sincerely,

Dora Adkins

4. The Plaintiff also sent emails to Self-Regarding another instance of something being spayed inside Guest Room #1505 while Plaintiff was asleep on Thursday, November 5, 2020 and reported the incident to Rodney Brinson,

Engineer for Hyatt Regency Hotel, located in Reston, VA on Friday, November 6, 2020; and the need to make a repair in the shower of Guest Room #1505 and a required upgrading of Hyatt Regency Systems received underneath the door of Guest Room #1505 on November 5, 2020. (EMAIL #1: See, Email Sent to Self-Regarding the Chemical Spayed Inside Guest Room #1505, Dated, November 11, 2020; EMAIL #2: See, Other Emails Sent to Self-Regarding the Something Being Sprayed Inside Guest Room #1505, Dated, November 6, 2020; EXHIBIT #3: See, Notice Received from Tyson Warren, General Manager for Hyatt Regency Reston Hotel, Dated, November 5, 2020))).

EMAIL TO SELF REGARDING STAY AT HYATT REGENCY HOTEL LOCATED IN RESTON, VA

From: doraadkins7@aol.com

To: DoraAdkins7@aol.com < DoraAdkins7@aol.com>

Cc: DoraAdkins7@aol.com < DoraAdkins7@aol.com>

Date: Fri, Nov 6, 2020 12:37 pm

EMAIL TO SELF REGARDING STAY AT HYATT REGENCY HOTEL LOCATED IN RESTON, VA

November 6, 2020

On Thursday, October 29, 2020, Rodney Brinson, Engineer for Hyatt Regency Hotel, located in Reston, VA knocked on Guest Room #1505 and informed me that it was reported by other Guests that the water inside the shower in their Guest Room was HOT.

On October 29, 2020, I reported to Mr. Brinson, that the water inside Guest Room #1505 had been extremely HOT since the start of my stay in August 2020 and that there had not been any COLD water and that my skin turned red from the extreme HOT water. I also shared that extremely HOT water was not good for the skin and that my skin had

suffered red rashes on it. Mr. Brinson stated that he came by because he wanted to have an engineer take a look at the device in the shower of Guest Room #1505 to see if it needed replacing. I shared that as of Thursday, October 29, 2020 the water in the shower had not been Hot but Cold with an adjustable temperature had returned in the pass 3-days and that I would call him if the ALL HOT water in Guest Room #105 returned.

On Thursday, November 5, 2020, I received a Notice from Hyatt Regency Hotel General Manager, Tyson Warren that access to Guest Room #1505 was needed to "upgrade our systems." I telephoned the Front Desk on Thursday, November 5, 2020 and requested an appointment through Desiree, Front Desk Agent for 9:00 a.m. on Friday, November 6, 2020. On November 6, 2020, I also telephoned Mr. Brinson to ensure he was aware of the 9:00 a.m. appointment. He stated that the Notice did not go into details, but access was needed to install a device on the TV or Desk in the Guest Room for Security for the Housekeepers in case there was an emergency. WHY DIDN'T MR. BRINSON KNOW WHETHER IT WAS THE TV OR THE DESK?

On November 6, 2020, I telephoned back to Mr. Brinson to inform him that for Security purposes, I should not be inside Guest Room #1505 for the 5-minute upgrade because my identity would be revealed to the Contractors. He offered a nearby Guest Room #1506 which was directly across from Guest Room #1505; and I did not see ANYTHING OCCUR except the person looking around inside the Guest Room. As well as BECAUSE OF COVID-19 and that the upgrade was causing me a lot of problems because I do not want anything touched inside Guest Room #1505. Mr. Brinson ensured me that nothing would be touched. Mr. Brinson MUST have forgotten my request within minutes because instead of providing me the Guest Room before the contractors came, HE CAME with two CONTRACTORS and addressed me by my first name "Dora." Mr. Brinson COULD SEE I was visibly upset by his action without me explaining and asked the two contractors to wait in the hallway before the elevators but the two contactors still saw my face and was looking at me as though they NEVER seen a person before.

The whole process was very upsetting because I had to clean behind

COUNT #1: ELEMENTS OF BREACH OF CONTRACT & FACTS TO SUPPORT A CAUSE OF ACTION FOR BREACH OF CONTRACT: ELEMENTS OF BREACH OF CONTRACT:

- 5. Plaintiff realleges paragraphs 1 through 4 as though fully set forth herein.
- 6. The elements of breach of contract include the following: *Brown v*. *Harms*, 251 Va. 301, 306, 467 S.E.2d 805, 807 (Va. 1996) ("the essential elements of a cause of action for breach of contract are: (1) a legal obligation of a defendant to the plaintiff, (2) a violation or breach of that right or duty, and (3) a consequential injury or damage to the plaintiff.") (internal quotations omitted)

 Retrieved on November 17, 2020 from http://www.nylitguide.com/survey-50 states
 breach-contract-claim/
 - (1) The existence of a valid contract:

"a written or spoken agreement, especially one concerning employment, sales, or tenancy, that is intended to be enforceable by law."

FACTS TO SUPPORT A CAUSE OF ACTION FOR BREACH OF CONTRACT:

- 7. Plaintiff realleges paragraphs 1 through 4 as though fully set forth herein.
- 8. The Plaintiff is staying at the Defendant, Hyatt Corporation, Hyatt Regency Reston Hotel from August 18, 2020 through Present who entered into Contract with Plaintiff when Plaintiff paid the room rate in exchange for a Guest's Room. 2) Performance or tendered performance by the Plaintiff: The Plaintiff

the two; Mr. Brinson and the Contractor who entered Guest Room #1505 with wearing coverings of their shoes in a 4-STAR Hotel, the Hyatt Regency.

I also questioned twice if the one person who entered Guest Room #1505 was also staying in Guest Room #1504 and/or directly beside Guest Room #1505 because I reported to Mr. Brinson that I was awakened with a smell that got inside Guest Room #1505 at approximately 10:00 p.m. on Thursday, November 5, 2020. Mr. Brinson had stated that the CONTRACTORS were staying at the Hotel and that the upgrade had been going on earlier in the week. Mr. Brinson asked if the smell came from the next Guest Room directly beside Guest Room #1505 and I stated I did not know.

I also reported to Mr. Brinson whether or not there were gold bars in the Guest Rooms near Guest Room #1505 because the Guest Rooms had Guest in and out of the Guest Rooms as if there were NO OTHER Guest Rooms available in the entire Hotel. I stated that the Hotel is not sold out because I leave the Hotel EVERY DAY and can see that the Hotel is not SOLD out. Mr. Brinson seen to be aware that there is a 24-Hour Guideline because of COVID-19 restrictions and stated he would check with the Front Desk.

THE WHOLE NEED TO GET INSIDE GUEST ROOM #1505 IS UNNEVING AND VERY-UPSETTING BECAUSE I DON'T BELIEVE THE NEED.

The protocol to have an outside CONTRACTOR INSIDE Guest Room #1505 while being occupied is IMPROPER and a HUGE RISK; EVEN FOR 5-MINUTES. IT APPEARS THAT THE FIRST ATTEMPT DID'T WORK BECAUSE THE HOT WATER CORRECTED ITSELF IN THE SHOWER OF GUEST ROOM #1505 AND MR. BRINSON ALSO STATED THAT THE PROBLEM WAS IN GUEST ROOM #1405. WHY DIDN'T MR. BRINSON CHECK GUEST ROOM #1405 BEFORE DISTURBING ME ON THURSDAY, OCTOBER 29, 2020.

Sincerely,

Dora Adkins

performed her duty by paying approximately \$16,000.00 for the Guest's Room either before or shortly after using Guest's Room ##1505.

- 9. "A breach of contract occurs when a party fails to perform an act that it has expressly or impliedly promised to perform." Defendant, Hyatt Corporation, failed to sell the Plaintiff a Guest's Room in which she paid for; free of chemicals poisoning
- 10. The Defendant's Business of selling Guest's Rooms for a daily rate is expressly or implied promise that the Plaintiff as a "Guest" will go without incident if Plaintiff pays on time and/or upon an agreed upon date to live in a Hotel's Guest Room.
- 11. The Plaintiff did not bargain with the Defendant, Hyatt Corporation, to cause her severe and debilitating brain injury; if not death, by attempted premeditated murder of spraying a chemical poisoning directly inside Guest Room #1505.
- 12. The Defendant, Hyatt Corporation, through a Contract with the Plaintiff had a legal obligation to the Plaintiff to ensure her paid-for-room would be free of chemical poisoning and to perform any investigation and/or changes requires when Plaintiff reported that something was sprayed into Guest Room #1505 on November 5, 2020, at approximately 10:00 p.m.
 - 13. The Defendant, Hyatt Corporation, violated or breached that right or

duty when it failed without any fault of Plaintiff to provide a Guest's Room as promised in the contract and caused the Plaintiff to become seriously physically injured with severe debilitating Head and/or Brian injury which caused Plaintiff rector bleeding to get rid of severe debilitating Head and/or Brian injury and AFTER Plaintiff discovered NO MEDICINE CAN RID the pain of a Brain Injury caused from chemical poisoning.

14. Upon the Guest's (who was Dora L. Adkins) request for reservation, a hotel (Hyatt Regency Reston Hotel) accommodation **Contract** comes into existence upon the Hotel's corresponding confirmation of the reservation that took place on August 18, 2020. Contractual Partners are the Hotel (Hyatt Regency Reston Hotel) and the Guest (Dora L. Adkins). The Hotel is obliged to have the booked rooms available according to the General Terms and to render the services agreed. The Guest is obliged to pay the prices applying to or agreed. On for provision of accommodation and additional services he/she has used.

COUNT #2: ELEMENTS FOR INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS AND FACTS TO SUPPORT INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS:

ELEMENTS FOR INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS:

- Extreme or outrageous conduct that
- Intentionally or recklessly causes
- Severe emotional distress (and possible also bodily harm)

FACTS TO SUPPORT INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS:

Extreme and Outrageous Conduct:

- 15. Plaintiff realleges paragraphs 1 through 4 as though fully set forth herein.
- Defendant, Hyatt Corporation alleged behavior constitutes extreme 16. and outrageous conduct when it allegedly intentionally and recklessly caused the Plaintiff to suffer a severe and debilitating Head and/or Brian injury from alleged chemical poisoning being sprayed directly inside Guest Room #1505. The pain Plaintiff suffered on Tuesday, November 10, 2020, from inhaling a chemical poisoning most likely carbon tetrachloride (a sweet smelling poisoning) attacked Plaintiff's brain cells and caused a severe brain injury... (EMAIL #1: See, Email Sent to Self-Regarding the Chemical Spayed Inside Guest Room #1505, Dated, November 11, 2020; EMAIL #3: See, Email Sent to Self-Regarding the Chemical Spayed Inside Guest Room #1505, Dated, November 15, 2020)).

Intent/Recklessness:

- 17. Plaintiff realleges paragraphs 1 through 4 as though fully set forth herein.
- 18. In addition to acting in an extreme an outrageous manner, Defendant, Hyatt Corporation acted with intent or recklessness because Hyatt Corporation allegedly targeted the Plaintiff when Rodney Brinson, Engineer for Hyatt Regency Hotel, located in Reston, VA knocked on the Guest Room door of #1505 and stated that reports by other Guests had been made that the Hot water was extremely Hot. (EMAIL #1: See, Email Sent to Self-Regarding the Chemical Spayed Inside

Guest Room #1505; <u>EMAIL #3:</u> See, Email Sent to Self-Regarding the Chemical Spayed Inside Guest Room #1505, Dated, November 15, 2020)).

Severe Emotional Distress:

- 19. Plaintiff realleges paragraphs 1 through 4 as though fully set forth herein.
- 20. In the Plaintiff's claim for Intentional Infliction, the Plaintiff's Emotional Distress in response to extreme and outrageous behavior reached a "severe" level. The Plaintiff can prove an injury that the Emotional Distress she experienced reached a sufficient level of severity, which justifies an award for Intentional Infliction. (EMAIL #1: See, Email Sent to Self-Regarding the Chemical Spayed Inside Guest Room #1505, Dated, November 11, 2020; EMAIL #3: See, Email Sent to Self-Regarding the Chemical Spayed Inside Guest Room #1505, Dated, November 15, 2020)).
- 21. The intensity and duration of the emotional distress also contribute to Plaintiff's severity, in that, she become bed-ridden and/or out of commission when chemical poisoning make contact with Plaintiff's body. (EMAIL #1: See, Email Sent to Self-Regarding the Chemical Spayed Inside Guest Room #1505, Dated, November 11, 2020; EMAIL #3: See, Email Sent to Self-Regarding the Chemical Spayed Inside Guest Room #1505, Dated, November 15, 2020)).

CLAIM: ELEMENTS FOR PUNITIVE DAMAGES AND FACTS TO SUPPORT PUNITIVE DAMAGES:

ELEMENTS FOR PUNITIVE DAMAGES:

- 22. Plaintiff realleges paragraphs 1 through 4 as though fully set forth herein.
- 23. Punitive Damages may only be awarded where there is misconduct or actual malice, or such recklessness or negligence as to evince a conscious disregard of the rights of others. *Giant of Virginia v. Pigg*, 207 Va. 679, 685-86 (1967)."

FACTS TO SUPPORT PUNITIVE DAMAGES:

- 24. Plaintiff realleges paragraphs 1 through 4 as though fully set forth herein.
- 25. The Cause of Action for this lawsuit against Hyatt, Corporation is a Breach of Contract caused by the underlying torts of Intentional Infliction of Emotional Distress and a Claim for Punitive Damages. The Defendant's misconduct or actual malice, or such recklessness or negligence as to evince a conscious disregard of the rights of others caused the Plaintiff to come into direct contact with chemicals poisoning sprayed inside Guest #1505 Room occupied by the Plaintiff. The actions by the Defendant, Hyatt Corporation are premeditated murder because the Defendant, Hyatt Regency Reston Hotel was fully aware of Plaintiff's allergic reactions especially to chemicals and furthermore chemical poisoning have no place inside a Guest's Room. The actions by the tortfeasors were malicious.
- 26. The Defendant, Hyatt Corporation, misconduct, or actual malice or recklessness or negligence evinced a conscious disregard of the rights of the Plaintiff when employees at the Front Desk and/or management for Hyatt Regency

Reston Hotel are the ONLY individuals with knowledge that Plaintiff is in Guest Room #1505 because Plaintiff have not had ANY Guests and/or visitors inside Guest Room #1505. Allegedly, other Guests were not targeted through viscous harmful and unlawful actions directed against the Plaintiff; otherwise, there would be no Guests at the Defendant's Hotel.

- 27. The Defendant, Hyatt Corporation misconduct or actual malice or recklessness forced the Plaintiff to be on constant guard for safety and the protection of her life; and prevents relaxation one could have through proper services at a Hotel.
- 28. Plaintiff's damages consist of a severe debilitating excruciating Head and/or Brian injury.
- 29. Plaintiff should recover exemplary or punitive damages because the Plaintiff has shown in this Complaint that the willful and wanton acts were taken on a dry run on Thursday, November 5, 2020 when a non-chemical substance was spayed inside Guest Room #1505 and no actions were taken by Rodney Brinson, Engineer for Hyatt Regency Hotel, located in Reston, VA when Plaintiff reported the problem to Mr. Brinson on Friday, November 6, 2020.

SUMMARY:

30. The Plaintiff was subjected to actual malice, or such recklessness or

negligence by the Defendant, Hyatt Corporation as to evince a conscious disregard of the rights of other intentional harmful and unlawful actions. Plaintiff inhaled a chemical poisoning most likely carbon tetrachloride (a sweet- smelling poisoning) that attacked Plaintiff's brain cells and caused a brain injury. "The primary effects of carbon tetrachloride in humans are on the liver, kidneys, and central nervous system (CNS). Human symptoms of acute (short-term) inhalation and oral exposures to carbon tetrachloride include headache, weakness, lethargy, nausea, and vomiting."

31. WHEREFORE, this Plaintiff claims SIX-HUNDRED MILLION DOLLARS and whatever else this Honorable Court deems appropriate.

Respectfully Yours,

Dora L. Adkins, pro se

EMAIL #3:

Fwd: EMAIL TO SELF REGARDING CHEMICAL POISONING SPRAYED INISIDE GUEST ROOM #1505 AT THE HYATT REGENCY HOTEL LOCATED IN RESTON, VA

From: doraadkins7@aol.com

To: DoraAdkins7@aol.com < DoraAdkins7@aol.com>

Cc: DoraAdkins7@aol.com < DoraAdkins7@aol.com>

Date: Sun, Nov 15, 2020 1:38 pm

CHEMICAL POISONING SMELL SPRAYED INSIDE GUEST ROOM #1505 HAS A SWEET DEADLY SMELL!!!

November 15, 2020

The pain I suffered on Wednesday, November 10, 2020, from inhaling a chemical poisoning most likely carbon tetrachloride (a sweet smelling poisoning) attacked my brain cells and caused a brain injury because the pain have been suffered by me before and CANNOT be eased by taking medicine prescribed for a Migraine Headache. I realized on Saturday, November 14, 2020, that the debilitating and extreme pain I suffered on Wednesday, November 10, 2020 was a BRAIN INJURY.

I RESEARCHED A SWEET-SMELLING POISONING AND CARBON TETRACHLORIDE CAME UP.

"The primary effects of carbon tetrachloride in humans are on the liver, kidneys, and central nervous system (CNS). Human symptoms of acute (short-term) inhalation and oral exposures to carbon tetrachloride include headache, weakness, lethargy, nausea, and vomiting."

I reported the first smell of something being sprayed inside Guest Room #1505 to Rodney Brinson, Engineer for Hyatt Regency Hotel, located in Reston VA on Friday, November 6, 2020, but have not reported the incident to Tyson Warren, General Manager Hyatt Regency Hotel, located in Reston VA in fear of having NO PLACE TO STAY.

I thought about going to the police but from past experiences that has not worked in numbers 1-5; number 6; and number 10. I also reported the chemical poisoning that caused my DEATH used at Adaire Apartment to the Police.

It happened before whereby a chemical poisoning most likely carbon tetrachloride (a sweet-smelling poisoning) was spayed into my nearby surroundings in the following cases:

- 1) Hallmark Condominium
- 2) Hallmark Condominium
- 3) Hallmark Condominium
- 4) Hallmark Condominium
- 5) Hallmark Condominium

NOTE: I was seen by an ER physician who treated me for a Migraine Headache for the 5 Brain Injuries in Numbers 1-5, which I now KNOW from November 10, 2020 chemical poisoning on the Brain counteracts with any Migraine headache medicine.

- 6) Embassy Suites Hotel
- 7) Renaissance Hotel
- 8) Hilton Garden Inn Woodbridge, VA
- 9) Hyatt Regency
- 10) Hilton Alexandria Mark Center

The above list which may be incomplete contains when I came in direct contact with a sweet-smelling poisoning most likely carbon tetrachloride while living in my own condominium or living in a Hotel."

Sincerely,

Dora Adkins

----Original Message----

From: doraadkins7@aol.com

To: <u>DoraAdkins7@aol.com</u> < <u>DoraAdkins7@aol.com</u>>

Cc: <u>DoraAdkins7@aol.com</u> < <u>DoraAdkins7@aol.com</u>>

Sent: Thu, Nov 12, 2020 6:45 pm

Subject: Fwd: EMAIL TO SELF REGARDING CHEMICAL

POISONING SPRAYED INISIDE GUEST ROOM #1505 AT THE

HYATT REGENCY HOTEL LOCATED IN RESTON, VA

CHEMICAL POISONING SMELL SPRAYED INSIDE GUEST ROOM #1505 HAS A SWEET DEADLY SMELL!!!

Someone allegedly sprayed carbon tetrachloride inside Guest Room #1505 because it had a very sweet smell and gave me a severe migraine headache.

To cover up the crime several Guests were assigned to nearby Guest Rooms.

----Original Message-----

From: doraadkins7@aol.com

To: <u>DoraAdkins7@aol.com</u> < <u>DoraAdkins7@aol.com</u>>

Cc: <u>DoraAdkins7@aol.com</u> < <u>DoraAdkins7@aol.com</u>>

Sent: Wed, Nov 11, 2020 8:22 am

Subject: Fwd: EMAIL TO SELF REGARDING CHEMICAL

POISONING SPRAYED INISIDE GUEST ROOM #1505 AT THE

HYATT REGENCY HOTEL LOCATED IN RESTON, VA

CHEMICAL POISONING SMELL SPRAYED INSIDE GUEST ROOM #1505 HAS A SWEET DEADLY SMELL!!!

----Original Message----

From: doraadkins7@aol.com

To: <u>DoraAdkins7@aol.com</u> < <u>DoraAdkins7@aol.com</u>> Cc: <u>DoraAdkins7@aol.com</u> < <u>DoraAdkins7@aol.com</u>>

Sent: Wed, Nov 11, 2020 8:17 am

Subject: EMAIL TO SELF REGARDING CHEMICAL POISONING SPRAYED INISIDE GUEST ROOM #1505

EMAIL TO SELF REGARDING CHEMICAL POISONING SPRAYED INISIDE GUEST ROOM #1505 AT THE HYATT REGENCY HOTEL LOCATED IN RESTON, VA

November 11, 2020

On November 10, 2020, after I returned from about 2-Hours of being out of Guest Room #1505 A CHEMICAL POISOING WAS SPRAYED INSIDE GUEST ROOM #1505.I became IMMEDIATELY GOT SICK with migraine headache, nausea and overall sickness. Something being sprayed inside Guest Room #1505 started on **Thursday**, **November 5, 2020** and I reported the incident to Rodney Brinson, Engineer for Hyatt Regency Hotel, located in Reston VA on Friday, November 6, 2020 when there was a made-up reason to enter Guest Room #1505 per a Notice received from Tyson Warren, General Manager on November 5, 2020.

Guest Room #1505 filled the air with the spayed substance.

WHEN WILL IT STOP! WHEN WILL IT STTOP!

If I leave the Hyatt Regency Hotel, located in Reston VA, WHERE WILL I GO IN THIS COVID-A9 PANDEMIC!! WITH NO FUNDS TO DO ANYTHING INCLUDING EATING!!!

Guests have been switched in and out of the Guest Room directly beside Guest Room #1505 to prevent detection of where the CHEMICAL POISONING IS COMING FROM. The Housekeeper is called to clean the Guest Room to prevent detection of where the CHEMICAL POISONING IS COMING FROM.

Sincerely,

Dora Adkins

ADDENDUM

COMPENSATORY DAMAGES:

- 1. "In accord with the foregoings, Plaintiff claim damages against Defendant as follows:"
 - A. Compensatory Damages: TOTAL = Approximately \$16,000,000 (NOT INCLUDED):
 - (i) "Cost for Medicine for Brian Injury approximately \$6.00

<u>Note:</u> The Plaintiff reserves the right to amend the compensatory (which was not added in) and the amounts for Breach of Contract; Intentional Infliction of Emotional Distress; and for Punitive Damages as a *Prima Facie* Case.

B. DAMAGES: SIX MILLION DOLLARS for:

<u>Count #1</u>: Breach of Contract; <u>Count #2</u>: Intentional Infliction of Emotional Distress; <u>Claim</u>: and Punitive Damages.

<u>Damages</u> - means the amount of compensation the Plaintiff is seeking in this lawsuit <u>Count #1</u>: Breach of Contract; <u>Count #2</u>; Tort of Intentional Infliction of Emotional Distress; and a Claim for Punitive Damages as a *Prima Facie* Case.

JURY DEMANDED

2. Trial by jury is demanded.

WHEREFORE, Plaintiff demands judgment against the Defendant, Hyatt Corporation in the TOTAL amount of SIX HUNDRED MILLION DOLLARS for Breach of Contract – 200 MILLION; Intentional Infliction of Emotional Distress – 200 MILLION; Punitive Damages – 200-MILLION; Claim for Punitive Damages-

200-Million as a *Prima Facie* Case and/or whatever else the Court deem appropriate.

Respectfully Yours,

Dora L. Adkins, pro se

Dora L. Adkins P.O. Box 3825 Merrifield, Virginia 22116 <u>DoraAdkins7@aol.com</u> No Telephone

Note: There is no way to contact the Plaintiff; except, by U.S. Mail to the above address because there is no working telephone number(s) to provide.

HYATT CORPORATION Registered Agent/Registered Office 100 Shockoe Slip Fl 2 Richmond, VA, 23219 - 4100, USA

PHYSICAL ADDRESS OF HOTEL:

Hyatt Regency Reston 1800 Presidents Street Reston, VA 22190 Phone: (703) 709-1234

Fax: 703-295-8295

CERTIFICATE OF SERVICE:

I certify that on November 17, 2020 I filed a "Complaint" along with all Exhibits and Emails as it relates to the Defendant, Hyatt Corporation.

Respectfully Yours,

Dora L. Adkins, pro se

EXHIBITS:

EXHIBIT #1: See, Copy of Business Entity Details for Hyatt Corporation, Proof of Diversity

EXHIBIT #2: See, Copy of Reservations made on August 18, 2020 through Present at the Hyatt Regency Reston Hotel

EXHIBIT #3: See, Notice Received from Tyson Warren, General Manager for Hyatt Regency Reston Hotel, Dated, November 5, 2020

EMAILS:

EMAIL #1: See, Email Sent to Self-Regarding the Chemical Spayed Inside Guest Room #1505, Dated, November 11, 2020

EMAIL #2: See, Other Emails Sent to Self-Regarding the Something Being Sprayed Inside Guest Room #1505, Dated, November 6, 2020

EMAIL #3: See, Email Sent to Self-Regarding the Chemical Spayed Inside Guest Room #1505, Dated, November 15, 2020

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

DORA L. ADKINS,

Plaintiff,

v. Civil Action No.:

HYATT CORPORATION,

Defendant.

CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared or assisted in the preparation of this document.

Dora L. Adkins

Name of Pro Se Party (Print or Type)

Executed on November 17, 2020 (Date)

OR

Dora L. Adkins

(Name of Attorney)

No Telephone Number

(Telephone Number of Attorney)

Prepared or assisted in preparation of this document.

Dora L. Adkins

Name of Pro Se Party (Print or Type)

Signature of Pro Se Party (Print or Type)

Executed on November 17, 2020 (Date)